

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

LLEWELLYN CONNOLLY, et al,

Plaintiffs

v.

CEM KINAY, et al.

Defendants

Civil Action No. 11-CV-0606 (RJS)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Defendants Cem Kinay, Marjorie Kinay, Halis Sumer and Mer Insaat's (the "Kinay Defendants") Motion to Dismiss the Complaint for *forum non conveniens*, the Kinay Defendants by and through their undersigned attorneys, Louis F. Burke P.C., will move this Court, before the Honorable Richard J. Sullivan, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, on a date and at a time to be designated by the Court, for an Order (i) dismissing the Complaint for *forum non conveniens*; and (ii) granting such other and further relief as this Court may deem just and proper.

Dated: New York, NY  
July 21, 2011

LOUIS F. BURKE, P.C.

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